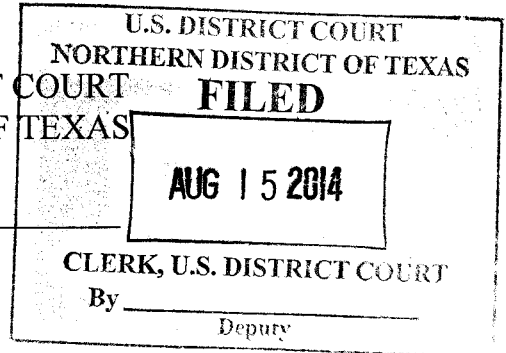


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

No. 4:14-CR-127-A

DESIREE ALIA BAKHSHAI (01)

FACTUAL RESUME

INDICTMENT: 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), possession with intent to distribute of methamphetamine, a Schedule II Controlled Substance;

PENALTY: Imprisonment for not more than twenty (20) years, and a fine of not more than One Million Dollars (\$1,000,000.00), or both such fine and imprisonment; plus a term of supervised release of not less than three (3) years must follow any term of imprisonment.

MAXIMUM

PENALTY: The maximum penalties the Court can impose include:

Imprisonment for Twenty (20) Years, and a fine of One Million Dollars (\$1,000,000.00), plus a term of supervised release of three (3) years must follow any term of imprisonment.

If Bakhshai violates any condition of supervised release, he could be imprisoned for the entire term of supervised release, resulting in an additional sentence of up to three (3) years.

Bakhshai will be required to pay \$100.00 mandatory special assessment;

Bakhshai may be required to pay restitution to victims or to the community, which may be mandatory under the law; and

Bakhshai may be required to pay costs of incarceration and supervision.

**ELEMENTS OF
THE OFFENSE:**

In order to prove the offense of possession with intent to distribute of methamphetamine, as alleged in the Indictment, the government must prove each of the following elements beyond a reasonable doubt:

First: That the defendant knowingly possessed a schedule II, controlled substance;

Second: That the substance was, in fact, methamphetamine; and,

Third: That the defendant intended to distribute the methamphetamine to some other person.

STIPULATION OF FACTS:

On Saturday, April 19, 2014, an off-duty Arlington Police officer observed a vehicle driving erratically on I-20 in Arlington, Tarrant County, Texas. While the officer watched, the vehicle crossed multiple lanes of traffic and exited the freeway on to State Highway 360, where the officer observed the vehicle wreck on a guard rail. The vehicle's driver, the defendant, Desiree Alia Bakhshai, got out of the vehicle and was approached by the officer and other witnesses.

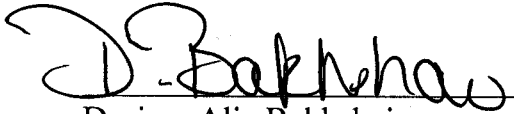
Other officers soon arrived and arrested the defendant for driving while intoxicated. During their inventory of the defendant's vehicle, officers found a box containing rice and bags of what the officer recognized as methamphetamine.

The methamphetamine was submitted to the crime laboratory for analysis where it was determined to total approximately 30 grams of 70% methamphetamine.

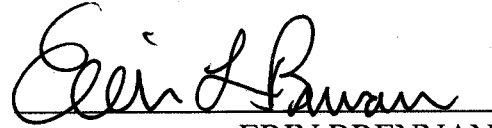
Bakhshai possessed the methamphetamine with the intent to distribute it to some other person.

AGREED AND STIPULATED on this 13th day of August, 2014.

Respectfully submitted,



Desiree Alia Bakhshai
Defendant



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